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KEVIN T. SULLIVAN
Assistant United States Attorney

Before: THE HONORABLE ANDREW E. KRAUSE
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA : **SEALED COMPLAINT** 22MJ218
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- v.- : Violation of 21 U.S.C.
: § 846
:
SHAQUEL VAUGHAN, :
KAHLIL WILLIAMS, and : COUNTIES OF OFFENSE:
KARINA GRIGORYEVA, : NEW YORK
: WESTCHESTER
Defendants. :
:
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SOUTHERN DISTRICT OF NEW YORK, ss.:

David Schwartz, being duly sworn, deposes and says that he is a Postal Inspector with the U.S. Postal Inspection Service, and charges as follows:

COUNT ONE
(Narcotics Conspiracy)

1. From at least in or about September 2021 up to and including in or about January 2022, in the Southern District of New York and elsewhere, SHAQUEL VAUGHAN, KAHLIL WILLIAMS, and KARINA GRIGORYEVA, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that SHAQUEL VAUGHAN, KAHLIL WILLIAMS, and KARINA GRIGORYEVA, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that SHAQUEL VAUGHAN, KAHLIL WILLIAMS, and KARINA GRIGORYEVA, the defendants,

conspired to distribute and possess with intent to distribute were (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A), (ii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A), and (iii) 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

4. I am a Postal Inspector with the U.S. Postal Inspection Service ("USPIS") currently assigned as a Task Force Officer of the Homeland Security Investigations ("HSI") Dark Web Task Force and I have been personally involved in the investigation of this matter. This Affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents and others, as well as my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that HSI, the USPIS, the Drug Enforcement Administration ("DEA"), U.S. Customs and Border Protection ("CBP"), and the New York City Police Department ("NYPD") have been investigating the trafficking and distribution of narcotics through, in part, the Dark Web, in and around the New York City area, including to locations in Manhattan, Brooklyn, and Westchester County, among others, by SHAQUEL VAUGHAN, KAHLIL WILLIAMS, and KARINA GRIGORYEVA, the defendants. Over the course of the investigation, law enforcement officers have conducted multiple undercover purchases via the Dark Web of quantities of pills containing fentanyl and methamphetamine and have further seized packages sent by or addressed to VAUGHAN and WILLIAMS, in particular, containing pills or other narcotics. Overall, law

enforcement officers have recovered in excess of approximately five kilograms of crystal methamphetamine, approximately 1.074 kilograms of fentanyl, approximately 2.265 kilograms of cocaine, and quantities of numerous pills found to contain methamphetamine or fentanyl.

The DarkOde Marketplace

6. Based on my training and experience, I know that the Dark Web is a part of the Internet in which data and content is not indexed by traditional search engines and consists of overlaying networks that use the Internet but require unique software, browsers, configuration, and/or authorization to access such data and content. I further know that the Dark Web is predominantly designed to hide the identity of users accessing such data and content and/or to communicate with each other.

7. Based on my own participation in this investigation and other narcotics investigations, including my work and observations as an undercover buyer of narcotics sold on the Dark Web, I know that online marketplaces exist on the Dark Web in which Dark Web users can buy and sell illicit materials, including narcotics. I further know that the "DarkOde" marketplace is one such marketplace on the Dark Web in which users can buy and sell narcotics, having myself conducted multiple undercover purchases of narcotics on the DarkOde marketplace.

First Undercover Purchase

8. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that in or about September 2021, members of a California-based law enforcement taskforce conducting regular undercover purchases via the Dark Web of narcotics conducted one such undercover purchase from an online vendor on the DarkOde marketplace listed under the moniker "bestinhere" ("BESTINHERE"). I further know the following about that undercover purchase:

a. On or about September 28, 2021, law enforcement officers placed an undercover online purchase with the BESTINHERE vendor on the DarkOde marketplace for 31 pressed pills of purported Adderall and provided the BESTINHERE vendor with a post office box number maintained by law enforcement for investigative purposes (the "California PO Box").

b. On or about October 1, 2021, a U.S. Postal Service ("USPS") Priority Mail package was delivered to the California PO Box. Inside of the package were approximately 31 pills that were each a pink-peach color, oval in shape, and stamped with "30" on one side and "b 974" on the other side, which, based on my training and experience, I know appear consistent with generic Adderall pills.

c. The return address on the USPS Priority Mail packaged delivered to the California PO Box listed the sender as "Russ Lorain" at 19 Stanton Street, New York, New York 10002.

d. In light of the return address listed on the package, the BESTINHERE vendor was referred to members of the HSI Dark Web Task Force in New York, including myself, for further investigation.

9. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that the purported Adderall pills were ultimately submitted to the NYPD Controlled Substances Laboratory for analysis. Based on my communications with personnel of the NYPD Controlled Substances Laboratory, I have learned that the purported Adderall pills tested positive for methamphetamine and weighed approximately 9.871 grams.

10. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, including my review of USPS records and information, I know that a USPS Click-N-Ship postage account with the username "tradel1997" (the "tradel1997 Click-N-Ship Account") paid for the postage and created the shipping label for the BESTINHERE package sent to the California PO Box. I further know that USPS records indicate that the tradel1997 Click-N-Ship Account is registered to a "Shaq Vaughn" at 1234 Pacific Street, Apartment C1, Brooklyn, New York 11216 (the "1234 Pacific Street Address").

Second Undercover Purchase

11. Based on my own participation in this investigation, I know that on or about November 1, 2021, I placed an undercover online purchase with the BESTINHERE vendor on the Dark0de marketplace, as further described below:

a. On or about November 1, 2021, I placed an online order with the BESTINHERE vendor on the Dark0de marketplace for 100 pressed pills of purported Adderall and 100 pressed pills of purported Percocet.

b. I paid for the purchase with Bitcoin, a cryptocurrency¹ -- specifically, approximately .011902 Bitcoin worth approximately \$726.15 -- using an online digital currency wallet and escrow system maintained by the Dark0de marketplace.

c. I provided the BESTINHERE vendor with the number of a post office box in Westchester County, New York that is maintained by law enforcement for investigative purposes (the "Westchester PO Box") to which the pills should be shipped.

d. On or about November 3, 2021, a USPS Priority Mail package was delivered to the Westchester PO Box. Inside of the package were two sets of approximately 105 pills each. One set consisted of the same pink-peach-colored pills sent to the California PO Box that are consistent with the appearance of generic Adderall pills. The other set consisted of pink, round pills each printed with "K56" on one side and nothing on the other, which, based on my training and experience, I know appear consistent with generic 10-milligram Percocet or oxycodone pills.

e. The return address on the USPS Priority Mail packaged delivered to the Westchester PO Box listed the sender as "BH LLC" and the return address as 19 Stanton Street, New York, New York 10002--i.e., the same return address as in the first undercover purchase described above.

12. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that the purported Adderall pills and the purported Percocet pills were submitted to the NYPD Controlled Substances Laboratory for analysis. Based on my communications with personnel of the NYPD Controlled Substances Laboratory, I have learned that the purported Adderall pills tested positive for methamphetamine and weighed approximately 43.73 grams, and the

¹ Based on my training and experience, I know that cryptocurrency is a digital currency in which encryption techniques are used to regulate the generation of units of currency and to verify the transfer of funds, operating independently of a central bank.

purported Percocet pills tested positive for fentanyl and weighed approximately 9.760 grams.

13. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, including my review of USPS records and information, I know that the tradel1997 Click-N-Ship Account paid for the postage and created the shipping label for the BESTINHERE package sent to the Westchester PO Box for the second under cover purchase.

**Seizure and Subsequent Search of
Subject Packages-1 and -2**

14. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, including my review of USPS records and information, I know that the tradel1997 Click-N-Ship Account also paid the postage and created the shipping labels for, among other packages, one package on or about November 1, 2021 ("Subject Package-1") and another package on or about October 28, 2021 ("Subject Pacakge-2"), which were removed from the mail stream by the USPIS for further inspection. I also know that upon execution of a judicially authorized search warrant, law enforcement officers recovered from Subject Package-1 20 pink, round pills each printed with "K56" on one side and nothing on the other -- similar to those recovered from the second undercover purchase - - which, again, based on my training and experience, I know appear consistent with generic 10-milligram Percocet or oxycodone pills. Law enforcement officers recovered from Subject Package-2 a bottle containing a red-orange liquid, which, based on my training and experience, I know appears consistent with codeine cough syrup.

15. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that the foregoing pills and liquid were submitted to the NYPD Controlled Substances Laboratory for analysis. Based on my communications with personnel of the NYPD Controlled Substances Laboratory, I have learned that the pills tested positive for fentanyl and weighed approximately 9.760 grams, and the liquid tested positive for dihydrocodeine and weighed approximately 54.176 grams.

Third Undercover Purchase

16. Based on my own participation in this investigation, I know that on or about on or about December 2, 2021, I placed another undercover online purchase with the BESTINHERE vendor on the Dark0de marketplace, as further described below:

a. On or about December 2, 2021, I placed an online order with the BESTINHERE vendor on the Dark0de marketplace for 150 pressed pills of purported Percocet.

b. I paid for the purchase with approximately .011106 Bitcoin worth approximately \$628.30 using an online digital currency wallet and escrow system maintained by the Dark0de marketplace.

c. I provided the BESTINHERE vendor with the same Westchester PO Box number to which the pills should be shipped.

d. On or about December 7, 2021, a USPS Priority Mail package was delivered to the Westchester PO Box. Inside of the package were 154 of the pink, round "K56"—similar to those recovered from the second undercover purchase and from Subject Package-1—which, again, based on my training and experience, appear consistent with generic 10-milligram Percocet or oxycodone pills.

e. The return address on the USPS Priority Mail packaged delivered to the Westchester PO Box listed the sender as "HAIRE BEST" and the return address as 19 Stanton Street, New York, New York 10002"—i.e., the same return address as in the first and second undercover purchases.

17. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that the purported Percocet pills were submitted to the NYPD Controlled Substances Laboratory for analysis. Based on my communications with personnel of the NYPD Controlled Substances Laboratory, I have learned that the purported Percocet pills tested positive for fentanyl and weighed approximately 14.167 grams.

18. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation,

including my review of USPS records and information, I know that the trade1997 Click-N-Ship Account paid for the postage and created the shipping label for the BESTINHERE package sent to the Westchester PO Box for the third under cover purchase.

**Surveillance of VAUGHAN and
Seizure and Subsequent Search of Subject Package-3**

19. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that, based on my review of records obtained from an internet service provider ("ISP-1") for a specific internet protocol or "IP" address ("IP Address-1") reflected in the IP session history for the trade1997 Click-N-Ship Account registered in the name of "Shaq Vaughn," IP Address-1 is connected to an internet service account registered in the name of SHAQUEL VAUGHAN, the defendant, for the following residence: 12 Ford Street, Apartment 3F, Brooklyn, New York 11213 (the "12 Ford Street Address"). I further know from a review of records obtained from PayPal that a PayPal account used to pay for postage purchased through the trade1997 Click-N-Ship Account, including postage for certain of the above-described undercover purchases, lists VAUGHAN as the subscriber and the 12 Ford Street Address as one of the several addresses for the account. Finally, based on my review of USPS records, I know that VAUGHAN has several USPS.com online accounts, and one those accounts lists the 12 Ford Street Address as the account address.

20. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that on or about December 6, 2021 beginning at approximately 2:00 p.m. law enforcement officers, including myself, conducting surveillance of the apartment building at the 12 Ford Street Address observed the following:

a. A vehicle ("Vehicle-1") was idling in front of 12 Ford Street when a male individual -- identified as SHAQUEL VAUGHAN, the defendant, based on a review of a photograph obtained from criminal history records for a Shaquel Vaughan at the 1234 Pacific Street Address -- exited 12 Ford Street and approached the rear of the vehicle with another male individual ("Male-1"). A female individual ("Female-1") exited the vehicle at that time, too.

b. The three individuals were out of view of the law enforcement officers for less than a minute when VAUGHAN came back into the view, holding a brown box, a box which appears to be a USPS Priority Mail box, and a white shopping bag that appears to contain USPS Priority Mail envelopes.

c. Male-1 and Female-1 then entered Vehicle-1 and drove away as VAUGHAN entered the apartment building at 12 Ford Street.

d. At approximately 3:48 p.m., VAUGHAN and another female individual ("Female-2") exited 12 Ford Street with Female-2 holding a reusable shopping bag containing unknown items and entered a nearby, parked vehicle ("Vehicle-2") and depart the area with law enforcement officers following and conducting visual surveillance.

e. At approximately 4:00 p.m., while driving east on Empire Boulevard in Brooklyn, Vehicle-2 pulled over at Empire Boulevard and Nostrand Avenue, and VAUGHAN and Female-2 exited the vehicle with Female-2 still holding the same reusable shopping bag previously seen, and they entered a post office at 315 Empire Boulevard (the "315 Empire Blvd. Post Office"). They exited the Post Office less than a minute later and walked away.

f. I and other law enforcement officers entered the 315 Empire Blvd. Post Office immediately thereafter and observed in a package drop-off bin near the entrance approximately eight packages with prepaid postage that were at the top of the pile and removed one of them ("Subject Package-3") from the mail stream for further inspection. Subject Package-3's label lists the sender as "HAIRE BEST" and the return address as 19 Stanton Street, New York, New York 10002 -- i.e., the same sender and return address as in the third undercover purchase described above and the same return address as in the first and second undercover purchases described above.

21. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that, upon execution of a judicially authorized search warrant, law enforcement officers recovered from Subject Package-3 a vacuum-sealed container holding numerous peach-colored, oval pills each printed with "b974" on one side and "30" on the other. Based on my training and experience, these pills appear consistent with generic 30-milligram Adderall pills. I further know that the pills were submitted to the DEA Northeast Laboratory for analysis. Based on my communications with

personnel of the DEA Northeast Laboratory, I have learned that the pills tested positive for methamphetamine and weighed approximately 42.5 grams.

22. Based on my later review of security footage subsequently obtained from the 315 Empire Blvd. Post Office of both the exterior entrance and interior area where the eight packages, including Subject Package-3, were dropped off, I know that the footage shows SHAQUEL VAUGHAN, the defendant, and Female-2 entering the Post Office with Female-2 holding the reusable shopping bag filled with the packages, Female-2 further emptying the bag into a large mail bin once inside, and then VAUGHAN and Female-2 exiting the Post Office with Female-2 folding up and holding the shopping bag in her hands.

Fourth Undercover Purchase

23. Based on my own participation in this investigation, I know that on or about on or about December 9, 2021, I placed another undercover online purchase with the BESTINHERE vendor on the Dark0de marketplace, as further described below:

a. On or about December 9, 2021, I placed an online order with the BESTINHERE vendor on the Dark0de marketplace for 100 pressed pills of purported Adderall.

b. I paid for the purchase with approximately .006541 Bitcoin worth approximately \$319.30 using an online digital currency wallet and escrow system maintained by the Dark0de marketplace.

c. I provided the BESTINHERE vendor with the same Westchester PO Box number to which the pills should be shipped.

d. On or about December 15, 2021, a USPS Priority Mail package was delivered to the Westchester PO Box. Inside of the package was a vacuum-sealed container holding numerous of same pink-peach-colored pills acquired in the first and second under purchases described above that are consistent with the appearance of generic Adderall pills.

e. The return address on the USPS Priority Mail packaged delivered to the Westchester PO Box listed the sender as "NICK SODUSKY" and the return address as 79 Herkimer Street, Brooklyn, New York 11216.

24. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that the purported Adderall pills were submitted to the DEA Northeast Laboratory for analysis. Based on my communications with personnel of the DEA Northeast Laboratory, I have learned that the purported Adderall pills tested positive for methamphetamine and weighed approximately 43 grams.

**Identification of Male-1 as WILLIAMS and
Seizure and Subsequent Search of Subject Package-4**

25. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, including my review of publicly available social media accounts belonging to SHAQUEL VAUGHAN and KHALIL WILLIAMS, the defendants, I know that, subsequent to the December 6, 2021 surveillance of VAUGHAN and Male-1, I identified Male-1 as WILLIAMS based on the appearance of Male-1 as observed during surveillance compared to a photograph obtained from New York State Department of Motor Vehicle records for a Khalil Williams as well as social media photographs. Based on my review of NYPD criminal history records for a Khalil Williams and information obtained from commercially available open-source databases, I have learned that an individual by the name of Khalil Williams was associated with an apartment in the same building as the 1234 Pacific Street address at which VAUGHAN previously resided.

26. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that on or about December 21, 2021, law enforcement officers, including myself, conducting surveillance of the apartment building at the 12 Ford Street Address observed a similar meeting between SHAQUEL VAUGHAN and KHALIL WILLIAMS, the defendants, as on December 6, 2021. Specifically, VAUGHAN was observed leaving 12 Ford Street and entering an adjoining apartment building at 24 Ford Street at approximately 12:50 p.m. A few minutes later, a vehicle driven by WILLIAMS with the same Female-1 in the front passenger seat pulled up and idled in front of 12 Ford Street. At approximately 1:00 p.m., law enforcement officers observed VAUGHAN exit 24 Ford Street and walk directly towards WILLIAMS's vehicle, talk to WILLIAMS, and then open the trunk of the vehicle and retrieve what appears to be a USPS package. VAUGHAN was then seen entering the vehicle, where he remains for a few more minutes before returning to 12 Ford Street with the USPS package.

27. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, including my review of USPS records and information, I know that KHALIL WILLIAMS, the defendant, has received mail as recently as on or about December 15, 2021 at 106 Somers Street, Apartment 1, Brooklyn, New York (the "106 Somers Street Address"). I further know that on or about January 3, 2022, law enforcement officers with the USPS removed from the mail stream for further inspection a USPS Priority Mail box shipped from Las Vegas to a "KHA WILLIAMS" at the 106 Somers Street Address ("Subject Package-4"), and, upon execution of a judicially authorized search warrant, recovered from inside of Subject Package-4 the following narcotics, as identified and weighed through field tests conducted by law enforcement officers: approximately 5 kilograms of crystal methamphetamine, approximately 2.265 kilograms of cocaine, and approximately 1.074 kilograms of fentanyl.

28. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, I know that on or about January 5, 2022 at approximately 10:57 a.m., law enforcement officers conducting surveillance of the apartment building at the 106 Somers Street Address observed KHALIL WILLIAMS, the defendant, exit the building, enter a nearby parked vehicle ("Vehicle-3"), drive to a Post Office at 1915 Fulton Street in Brooklyn, New York and go inside. Once inside, with a law enforcement officer also inside maintaining visual surveillance, WILLIAMS proceeded to a clerk window, provided the mail clerk with what was later confirmed to be the tracking number for Subject Package-4, asked the clerk if he could pick up the package, and then, when told it had not arrived, provided the clerk with a phone number for USPS to contact him when the package arrives. WILLIAMS then exited the Post Office, returned to Vehicle-3, and then drove back to and entered the apartment building at the 106 Somers Street Address.

Identification of Female-2 as GRIGORYEVA

29. Based on my review of reports and records in this investigation, my communications with other law enforcement officers, and my own participation in this investigation, including my review of package history records for packages sent from the trade1997 Click-N-Ship Account, which was used to send the narcotics packages for the first, second, and third undercover purchases detailed above as well as Subject Packages-1 and -2, I know that, on occasion, the trade1997 Click-N-Ship

Account was used to send packages in the actual name of SHAQUEL VAUGHAN, the defendant, at the 12 Ford Street Address as well as in the name of a "Karina Grigoyev" at the 12 Ford Street Address. I further know that an internet search for "Karina Grigoyev" led to a Linkedin profile for a "Karina Grigoryeva" who lists employment at a particular New York-based company ("Company-1"), and that Company-1's website lists a "Karina Grigoryeva" as an employee and provides an online biography and photograph of a female bearing a resemblance to Female-2 who dropped off the eight packages, including Subject Package-3, at the Post Office on or about December 6, 2021. Based on my review of publicly available social media accounts belonging to VAUGHAN, I know that images of Female-2 appear on VAUGHAN's social media in which she also bears a resemblance to the "Karina Grigoryeva" shown in the photograph on Company-1's website. Finally, based on my review of commercially available, open-source database information to determine a possible date of birth for a New York-based Karina Grigoryeva, and then subsequent search and review of photographs in a U.S. Customs and Immigration database based on such name and date of birth, I know that the female individual shown in a photograph for a citizenship application for a "Karina Grigoryeva" with the same such date of birth appears to be Female-2. Accordingly, I believe that Female-2 is KARINA GRIGORYEVA, the defendant.

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WHEREFORE, the deponent respectfully requests that warrants be issued for the arrest of SHAQUEL VAUGHAN, KAHLIL WILLIAMS, and KARINA GRIGORYEVA, the defendants, and that they be imprisoned or bailed, as the case may be.

/s/ David Schwartz (by AEK, with permission)

David Schwartz
Postal Inspector
U.S. Postal Inspection Service

Sworn to me through the
transmission of this Complaint
by reliable electronic means,
pursuant to Federal Rule of
Criminal Procedure 4.1, this
7th day of January, 2022
[by FaceTime].



HONORABLE ANDREW E. KRAUSE
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK